ASH GROVE CEMENT CO.
SEATTLE PLANT
Semi Annual NSPS Report
Opacity COMS Summary Report for 40 CFR 60.7(d)

Reporting period dates: July1, 2004– December 31, 2004
Company: Ash Grove Cement Company, 3801 E. Marginal Way So. Seattle, WA 98134
Process unit(s) description: The in-line kiln/raw mill system includes an ID fan, the main baghouse dust collector, the Raw Mill, preheater/precalciner, and rotary kiln. The system converts dry raw materials prepared in the raw mill into cement clinker by heating it to the point of incipient infusion in the preheater/ precalciner and kiln. New chemical compounds are formed in the clinkering process that produces the hydraulic properties of portland cement. The system is heated by fossil fuels that are combusted at the lower or clinker discharge end of the inclined rotary kiln and in the precalciner and tire derived fuel introduced to the system at in the precalciner. The flow of combustion products is countercurrent to the flow of raw materials in the kiln.

Emission limits: 20% @ 6 minute average
Monitor manufacturer and model no: Lear Siegler Dynatron 1100M
Date of latest COMS Certification or Audit: 9/29/04
Total source-operating time in reporting period: 3899.9 Hours

Include with the Emission Data Summary[1]:

1. **The duration of excess emissions in reporting period that was due to:**

(a) Startup/Shutdown:	0
(b) Control equipment problems:	0
(c) Process problems	0
(d) Other known causes:	0
(e) Unknown causes:	0

2. **The total duration of excess emission in minutes:** 0
3. **[Total duration of excess emissions]/[Total source operating time]*(100) = 0.0%[2]**

Include with the COMS Performance Summary[1]:

1. **The CMS downtime in reporting period due to:**

(a) Monitor equipment Malfunctions:	0
(b) Non-Monitor equipment Malfunctions:	1320
(c) Quality assurance calibration	0
(d) Other known causes:	0
(e) Unknown causes:	0

2. **The Total COMS Downtime in minutes:** 1320 minutes
3. **[Total COMS Downtime]/[Total operating time]*(100) = 0.5%[2]**

Describe any changes since last quarter in COMS, process or controls: None

Certify that the information attained in the report is true, accurate, and complete.

01/27/05

Gerald J. Brown, EHS Manager
Name and Signature (Title) of the responsible official and Date

1. For Opacity, record all times in minutes.
2. For the reporting period: If the total duration of excess emissions is ≥ 1% or the total CMS downtime is ≥ 5% of the total operating time, both the summary report form and the excess emission report described in 60.7(c) shall be submitted.

627316